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October 10, 2012

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D. C. 20554

Re: *Implementation of the Commercial Advertisement Loudness
Mitigation (CALM) Act, MB Docket No. 11-93 -- Request of W.A.T.C.H.
TV Company Inc. for Streamlined Financial Hardship Waiver*

Dear Ms. Dortch:

W.A.T.C.H. TV Company Inc., by its undersigned counsel, respectfully submits its attached request for a financial hardship waiver of the Commission's CALM Act rules. W.A.T.C.H. TV further asks that the Commission process the attached request on a streamlined basis in accordance with paragraphs 52-54 of its *Report and Order* in the above-reference proceeding.

Should there be any questions concerning this matter, please contact the undersigned.

Sincerely,

/s/ Robert D. Primosch

Robert D. Primosch



**W.A.T.C.H. TV COMPANY – REQUEST FOR FINANCIAL HARDSHIP WAIVER
(STREAMLINED PROCESSING)**

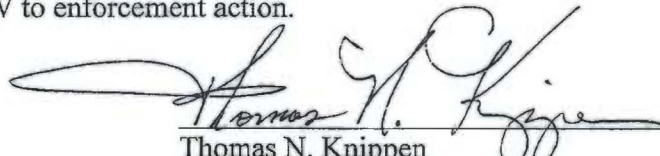
**IN THE MATTER OF THE COMMERCIAL ADVERTISEMENT
LOUDNESS MITIGATION (CALM) ACT
MB Docket No. 11-93**

W.A.T.C.H. TV Company Inc. ("W.A.T.C.H. TV"), operator of a wireless cable system providing multichannel video service to subscribers in and around Lima, Ohio, hereby requests a financial hardship waiver of the Commission's CALM Act rules, and further requests that the Commission process the instant request on a streamlined basis in accordance with paragraphs 52-55 of its *Report and Order* in MB Docket No. 11-93.

On behalf of W.A.T.C.H. TV, I, Thomas Knippen, hereby certifies that (1) W.A.T.C.H. TV had fewer than 15,000 multichannel video subscribers as of December 31, 2011, and is not affiliated with a larger operator serving more than 10 percent of all MVPD subscribers (and therefore meets the Commission's definition of a small MVPD System for purposes of this waiver request); and (2) W.A.T.C.H. TV needs a delay of one year to obtain ad insertion equipment (specifically the Model DTA-3000 Digital Ad Inserter from Digital Adware LLC) in order to avoid the financial hardship that would otherwise be imposed if it were required to obtain that equipment sooner.

I represent and warrant that the above certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission. I also acknowledge that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject W.A.T.C.H. TV to enforcement action.

10/9/2012
Date


Thomas N. Knippen
Vice President and General Manager
W.A.T.C.H. TV Company Inc.